

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

THERESSA LEVINE,

Plaintiff,

v.

CLIENT SERVICES, INC.,

Defendant.

Case No. 1:21-cv-00282-MAC

**STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

NOW COME THE PARTIES, Plaintiff Theresa Levine (“Plaintiff”) and Defendant Client Services, Inc. (“Defendant”), by and through their undersigned counsel (collectively “the Parties”).

1. This case involves individual and putative class action claims for violations of the Fair Debt Collection Practices Act (15 U.S.C. § 1692).

2. Defendant has answered Plaintiff’s Complaint. Dkts. 1 and 6. No counter-claim has been filed.

3. Federal Rule of Civil Procedure 41(a)(1)(B)(2) provides that “[e]xcept as provided in Rule 41(a)(1), an action may be dismissed at the plaintiff’s request only by court order, on terms that the court considers proper.”

4. The Parties are in agreement that each side shall bear their own costs.

WHEREFORE, the Parties respectfully propose that this action be dismissed without prejudice where each side shall bear their own costs

DATED: July 29, 2021

Respectfully submitted,

/s/ James C. Vlahakis  
James C. Vlahakis, Esq.

/s/ Patrick A. Watts (with consent)  
Patrick A. Watts, #6302112

Sulaiman Law Group, Ltd.  
2500 S. Highland Ave., Ste. 200  
Lombard, Illinois 60148  
Phone: (630) 575-8181  
Fax: (630) 575-8188  
jvlahakis@sulaimanlaw.com  
**COUNSEL FOR PLAINTIFF**

1200 South Big Bend Blvd  
Saint Louis, MO 63117  
pwatts@mamlaw.com  
P: (314) 669-5490  
F: (888) 632-6937  
**COUNSEL FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that I today caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which will be sent to all attorneys of record.

/s/ James C. Vlahakis  
James C. Vlahakis